To: "LaVigne, Paul" [plavigne@mt.gov]; ina Laidlaw/MO/R8/USEPA/US@EPA[]
Cc: "Suplee, Mike" [msuplee@mt.gov]
From: "Blend, Jeff"
Sent: Fri 9/2/2011 2:41:15 PM
Subject: RE: Talking point

Tina gave us brine disposal costs, but then realized they were not correct. But then, we just assumed they were already included in WERF costs. We must include them, if they were not included in WERF costs. Remember too, that the WERF study states that diminishing returns environmentally come in at WERF levels 3 and 4. This is due to large amounts of greenhouse gases and chemicals need for RO.

Paul, you will find me answers to #4, not #3 right? I already assumed from your numbers that Lolo and Stevensville are at WERF 1, which is no nutrient removal (at least not intentionally).

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-----Original Message-----
From: LaVigne, Paul
Sent: Friday, September 02, 2011 8:27 AM
To: Blend, Jeff; Laidlaw.Tina@epamail.epa.gov
Cc: Suplee, Mike
Subject: RE: Talking point

After talking with Dave Clark and Tina yesterday, I am going to look at a few assumptions in the WERF study. Obviously, if we can figure a way to estimate labor and maintenance, we should include those. I don't think we can ignore them. Dave mentioned that brine disposal costs are a weak link in the WERF study, so maybe we can look at that a little more. The other big thing that I have been wondering about with the WERF study is: what level of pretreatment must be provided prior to an RO system and did our cost estimates include those?

I will find answers to #3 below and get those to Jeff this morning.

I agree - 2% is a lot of money - it really is.

-----Original Message-----
From: Blend, Jeff
Sent: Friday, September 02, 2011 8:05 AM
To: Laidlaw.Tina@epamail.epa.gov
Cc: LaVigne, Paul; Suplee, Mike
Subject: Talking point

Tina:

Should I include Dave Clark on this email? Several things that need to be answered/stated

1) We know that the WERF numbers are an underestimate because WERF level 5 is not as stringent as our nutrient standards for N (but is slightly more stringent than ours for P). TN for us is 0.3 mg/l and for WERF level 5 is 1 mg/l. But, let us not go there for reasons Tina gave us...
2) The O&M costs do not include labor and maintenance. If maintenance in particular is a large part of the cost of a plant, then Helena, Havre and Kalispell might be pushed over 2%. However, I doubt that since those plants are large and would have large capital and chemical costs. But maybe... we should check on that. As it stands, Helena is 1.72 MHI, Kalispell 1.83 and Havre 1.89 to get to estimate base criteria. So, none of them are too far from triggering 2%.
3) Can we just ignore Missoula since they meet criteria with their mixing zone. Should we take them out of this study, or leave them in?
4) For Lolo and Stevensville, I need current user rates, design flow, actual flow and what WERF level they are currently at for nutrient removal. Paul and Tina, if you could work out who can get what, I could really use the info ASAP. Otherwise, it delays the draft that I give to Tina. Those are the last two towns that I am willing to add, unless we want to push the date of this things back (but we can't, given promises we made yesterday). Please, no more towns.
5) For towns at risk of not being able to meet the general variance and thus possibly applying for an individual variance, we could include the ten advanced dischargers at less than 1 MGD. I only know five off the top of my head: Columbia Falls, Manhattan, Lolo, Stevensville and Colstrip. Columbia Falls is already at variance levls, so they would take the variance. Larger systems that have a high cost to just get to a variance level are Livingston and Hamilton. Lagoons should not have to worry too much since they only need to meet the status quo. Mike, we may need to work on this.
6) I still disagree with EPA's insistence on 2% MHI being THE threshold. Of course, my opinion probably does not matter much, but let me show you some numbers. Kalispell's water bill increases 239% to get to base criteria. Helena's increases 205%. Havre's goes up 232%. In other words, the wastewater bills more than triple in the three best cases in Montana. The bills go up $505 to $802 per year per average household. That is a hell of a lot of money for one bill out of the stack of bills that a household has to pay off. What money is left over for beer and guns? But seriously, $800 is almost one mortgage payment for Becky and I. So I will agree to disagree with EPA on that point. If we get those towns over 2% then the point is moot.

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